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LETTER AND THE FRIDLEY SUPERFUND COMMUNITY ADVISORY GROUP RESPONSE  
TO THE FOURTH FIVE YEAR REVIEW REPORT NIROP FRIDLEY MN (PUBLIC  
DOCUMENT)  
06/10/2014  
FRIDLEY SUPERFUND COMMUNITIY ADVISORY GROUP

June 10, 2014

Mr. Mark Schultz  
Environmental Business Line Coordinator  
Department of the Navy  
NAVFAC Midwest  
201 Decatur Avenue, Building 1A  
Great Lakes, Illinois 60088-2801

Re: Naval Industrial Reserve Ordinance Plant (NIROP) Superfund Site  
4800 East River Road, Fridley, Minnesota  
Response to Fourth Five Year Review

Dear Mr. Schultz:

I am writing this letter on behalf of the Fridley Superfund Community Advisory Group (CAG). Our group was formed to facilitate the exchange of information between the public and State and Federal agencies regarding all of the superfund sites located in the City of Fridley, including the NIROP site. We are writing to you now in response to the fourth five year review report written regarding the NIROP site and which is dated October 17, 2013.

The CAG has received the five year review report, and we have also had this report reviewed by an independent contractor. That agency did a thorough analysis and review of the report and presented their findings to our group at a recent meeting.

The CAG's general response is that we have concerns with the current, short term remedies at the NIROP site and whether they are protective of human health and the environment. The CAG also has concerns about the feasibility and effectiveness of the long term remedies for this site.

#### **Surface Water Standards**

The NIROP five year review report implies that the proposed surface water standards have been approved by the Environmental Protection Agency (EPA) and the Minnesota Pollution Control Agency (MPCA). We believe that this is not entirely accurate, as to date, these standards have not been formally approved by these two agencies. As indicated by the Minnesota Pollution Control Agency, the Navy has not yet presented or implemented a surface water sampling plan, so this information is misleading. The CAG believes that the following questions need to be asked or more information needs to be provided in order to fully assess the surface water standards as referenced in the five year review report:

1. The surface water standards need to be clarified and need to be accurately portrayed in order to determine if those standards are currently being met at the site.
2. The Navy must implement and follow a clear surface water sampling plan.
3. Will a decision document be issued to record the surface water clean up goals?
4. Will any proposed changes regarding these standards be available for public comment?

#### **Are the Current Remedies at the Site Functioning as Intended?**

The five year review report lacks sufficient information to conclude that the contamination at the site is being fully captured. The original intent for this site was that the Navy would be certain to

fully contain the contamination plume. However, that has not occurred, as evidenced by the fact that contamination is still being discharged into the Mississippi River.

Additional extraction wells were recently installed, which appears to be helping to improve performance of the system. However, since these were just recently installed, it is difficult to determine at this time whether the addition of these additional extraction wells has been sufficient to now fully contain the plume. We believe that additional testing should be done to determine how effective the addition of these extraction wells has been, and only a longer period of time will give us the most accurate information.

### **Institutional Controls**

The five year review report does not contain much information about institutional controls for the land use at this site. With the pending redevelopment of the NIROP site, institutional controls are extremely important. The Navy has not done the appropriate review of records at the Registrar of Deeds' office to verify that the required use restrictions are in place, nor have they consistently submitted the appropriate land use control compliance certifications as required. Therefore, the CAG must voice their concern that the institution controls must be appropriately dealt with to ensure that the land use is dealt with properly, and the CAG requests that the Navy comply with the requests made by the EPA with regard to these institutional controls.

### **Vapor Intrusion**

The NIROP five year review report indicates no immediate concern about vapor intrusion. The CAG has serious concerns about this issue. Specifically, why is vapor intrusion not listed as an issue in the five year review report? The CAG would like to know when a full vapor intrusion assessment will be completed, as this will be the only way that vapor intrusion could be ruled out as an issue for the site.

### **Communication with City of Fridley**

It is our understanding that there was no communication with the City of Fridley or any of its officials while this five year report was prepared. Communication with the City of Fridley would have provided very valuable information about potential changes to the groundwater and changes to the land use, including information about the upcoming NIROP site redevelopment. The City of Fridley also has an interest in well #13, which is in close proximity to the NIROP site and must be considered. The five year report also states that the City of Fridley gets its water from the Mississippi River. This is incorrect information, and this information would have been presented accurately, had the Navy had discussions with the City of Fridley prior to issuing its report. The CAG feels that it is important for the Navy to have discussions with the City of Fridley prior to the submission of these five year review reports, as the City will have very useful information which should be contained in these reports.

In summary, the Fridley CAG does have concerns about the current state of the NIROP superfund site. We are requesting that the following issues be looked at and further information provided in order to ensure that the public health is being fully considered:

1. Clearly define surface water standards.
2. Assess hydraulic containment.
3. Assess institutional controls for the site.
4. Vapor intrusion assessment.

5. Communication with the City of Fridley must occur prior to the issuance of any further five year review reports.

On behalf of the CAG, I would request a response to this letter so that our questions can be answered and so that the concerns that we raised in this letter can be more fully addressed. We thank you for your time and invite you to contact our group with any questions. If you (or any other Navy representative) would like to provide any input to our group as a whole at an upcoming meeting, we would be happy to have you in attendance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jenny L. Petersen". The signature is fluid and cursive, with the first name "Jenny" being more prominent and the last name "Petersen" following in a similar style.

Jenny L. Petersen  
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